

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

**JOHN HENDRICKSON, individually  
and on behalf of all others similarly  
situated,**

Plaintiff,

**V.**

**JARED HALL and  
RYAN SETTY-O'CONNOR,**

**Defendants.**

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**No. 3:22-cv-02930-S**

**Collective Action under 29 U.S.C. § 216(b)**

## JURY DEMANDED

## DECLARATION OF JOHN HENDRICKSON

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. My name is John Hendrickson. I signed a written consent form to participate in this lawsuit.
2. I am over the age of 18, and I am competent to make this declaration. The facts stated in this declaration are within my personal knowledge and they are true and correct.
3. I was employed by Defendants Jared Hall and Ryan Setty-O'Connor as a service technician for approximately 19 months, from April 2021 to November 23, 2022.
4. During my employment, Defendants controlled virtually all aspects of my work and pay. As co-owners, they hired me and ultimately communicated to me that the company was closing and I no longer had a job. They told me when to show up for work and where. They assigned me work and I was required to adhere to the schedule that they assigned me. Defendants dictated the terms and conditions of my employment as well as how much I was to be paid.
5. Defendants paid me \$25.00 per hour.

6. I regularly worked approximately 50 hours per week. And although I was paid at a straight hourly rate, I was not paid an overtime premium of at least one-and-one-half times my regular rate of pay for hours worked in a workweek over 40.


7. Defendants never paid me my last paycheck. Based on previous paychecks I received, that check should have been approximately \$2,000.00.

8. I have calculated based on the best information available to me that I worked approximately 310 overtime hours during my employment for Defendants without being paid an overtime premium. This is based on approximately 10 overtime hours worked each week and approximately 31 weeks of employment.

9. Multiplying those 310 overtime hours by one-half of my \$25.00 hourly rate (\$12.50) equals \$3,875.00 in unpaid overtime wages.

10. When all of the damages that I am owed in this lawsuit (including overtime pay and an equal amount of liquidated damages) are added together, the total amount that I am owed is \$9,750.00, excluding attorney fees, costs, and interest.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed on Apr 25, 2023.

  
John Hendrickson (Apr 25, 2023 16:33 CDT)  
\_\_\_\_\_  
John Hendrickson